

The Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

JOHN DOE #1, an individual, JOHN
DOE #2, an individual, and PROTECT
MARRIAGE WASHINGTON.

Plaintiffs,

V.

SAM REED, in his official capacity as Secretary of State of State of Washington, BRENDA GALARZA, in her official capacity as Public Records Officer for the Secretary of State of Washington,

Defendants.

NO. 09-cv-05465-BHS

DESIGNATED DEPOSITION
TESTIMONY OF

Pursuant to Local Rule 32(e), Defendants Sam Reed and Brenda Galarza, Intervenors Washington Families Standing Together and the Washington Coalition for Open Government Plaintiffs John Doe #1, John Doe #2, and Protect Marriage Washington (collectively, the parties") hereby submit combined designated deposition testimony for

Defendants and Intervenors object to the admission of any deposition testimony taken of any witnesses who could be called to testify at trial. Therefore, the designations of

1 Defendants and Intervenors are being submitted in the event that the Court decides to admit
2 deposition testimony.

3 For the Court's convenience Defendants' designations have been highlighted in blue,
4 Intervenors' designations have been highlighted in pink, and Plaintiffs' designations have
5 been highlighted in yellow. Objections have been noted in the margins. Plaintiffs will be
6 filing the redacted versions of these documents.

7 DATED this 6th day of September, 2011.

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9 Attorney General

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

JOHN DOE #1, an individual, JOHN
DOE #2, an individual, and PROTECT
MARRIAGE WASHINGTON,

Plaintiffs,

vs.

NO. 3:9-CV-05456-BHS

SAM REED, in his official capacity
as Secretary of State of Washington,
BRENDA GALARZA, in her official
capacity as Public Records Officer
for the Secretary of State of
Washington,

Defendants.

DEPOSITION OF

Deposition upon oral examination of , taken
at the request of the Defendants, before Osmund D. Miller, a
Notary Public, RPR, CCR No. 2280, at the law offices of
Witherspoon-Kelley, 422 West Riverside, Spokane, Washington,
commencing at or about 9:00 a.m., on October 7, 2010 pursuant
to the Federal Rules of Civil Procedure.

1 APPEARANCES

2

3 FOR THE PLAINTIFFS:

4 STEPHEN PIDGEON ATTORNEY AT LAW, P.S.
5 By: Stephen Pidgeon
6 Attorney at Law
7 Old Federal Building
8 3002 Colby Avenue, Suite 306
9 Everett, Washington 98201

10 FOR THE DEFENDANTS WASHINGTON COALITION FOR OPEN GOVERNMENT:

11 WITHERSPOON-KELLEY
12 By: Steven J. Dixson
13 Attorney at Law
14 1100 U.S. Bank Building
15 422 West Riverside Avenue
16 Spokane, Washington 99201-0302

17 FOR THE DEFENDANTS SAM REED AND BRENDA GALARZA:

18 ATTORNEY GENERAL OF WASHINGTON
19 Anne E. Egeler
20 Deputy Solicitor General
21 P.O. Box 40100
22 Olympia, Washington 98504-0100

23 ALSO PRESENT:

24 Greg Senchenko, Interpreter

25

1 GREG SENCHENKO
2 the Interpreter, having been first duly
sworn according to law, did interpret from
English to Russian and Russian to English.

4 called as a witness at the request of
5 the Defendants, having been first duly
sworn according to law, did testify as
follows herein:

7 (All answers will be given through the interpreter unless
8 noted by the answer symbol.)

EXAMINATION

10 BY MR. DIXSON:

11 Q. Good morning, . My name is Steve Dixson. I
12 am an attorney for the Washington Coalition for Open
13 Government, one of the named defendants in the present
14 litigation. On the phone is Attorney Anne Egeler from the
15 Washington Attorney's General office. She may have some
16 follow-up questions when I am done this morning.

17 First off, have you ever been deposed before?

18 A. No.

19 INTERPRETER: I don't trust English responses.

20 Q. Okay. In that case, I would like to go over just some
21 basic ground rules with you this morning. It is important
22 that we get an accurate record of what is said in this room
23 today.

24 A. Uh-huh.

25 INTERPRETER: Yes.

1 Q. And, so, we have a court reporter who will be taking down
2 each of the questions, and your answers to those questions.

3 A. Uh-huh.

4 Q. As a result, it's important that you answer each question
5 with a "yes" or "no," or some type of spoken answer, and not
6 a nod of the head. Do you understand?

7 A. Yes.

8 Q. In addition -- and I don't think it will be a problem,
9 because we are using a translator -- we need to let each
10 other finish our sentences before asking the next question.
11 Do you understand that?

12 A. Yes.

13 Q. And if, today, I ask you a question that does not make
14 sense, or is somehow confusing, please ask me to restate the
15 question, and don't guess at what I am trying to ask you. Do
16 you understand that?

17 A. Yes.

18 Q. Did you meet with anyone prior to your deposition this
19 morning?

20 A. No.

21 Q. No. Okay. Have you spoken to anyone else who has been
22 deposed previously in this lawsuit?

23 A. No.

24 Q. Do you understand that as part of this lawsuit, and in
25 conjunction with the subpoena that was served upon you, you

1 were asked to bring documents evidencing threats, harassment
2 or reprisals as a result of your participation with
3 Referendum 71?

4 INTERPRETER: Yes.

5 Q. Did you bring any documents today?

6 INTERPRETER: I don't have specific documents. Like,
7 pictures or documents.

8 Q. So you do not have any responsive documents to the
9 subpoena evidencing threats, harassment or reprisals?

10 INTERPRETER: Well, I have, like, things -- like, I have
11 stickers put on my vehicle, a couple months ago, with bad
12 words, and -- but I didn't save them, and I just took them
13 down and threw them into the garbage can.

14 Q. Okay. We will talk about any harassment that you allege.
15 But with regard to documents, you did not bring any of those
16 today, correct?

17 INTERPRETER: Right. Because I don't have them.

18 Q. I see in front of you a folder. Are those documents that
19 you intend to speak about today?

20 INTERPRETER: This is just the documents that I received
21 from you, and an outline for myself.

22 Q. Okay. Have you spoken to anyone at your church regarding
23 the deposition today?

24 INTERPRETER: You mean, like, about today, or when we
25 were discussing the voting?

1 Q. Particularly, about the deposition today.

2 INTERPRETER: Yes. We had a church meeting, and we just
3 informed the church members that me and brother will be
4 attending this deposition.

5 Q. Did that happen -- did that meeting occur with the entire
6 congregation, or just a smaller group?

7 INTERPRETER: Yesterday, we had the members -- church
8 members meeting. This would be about half the size of the
9 church, and we did discuss some of this yesterday.

10 Q. How many people, approximately, were at the members
11 meeting?

12 INTERPRETER: Should I say this or not?

13 Q. Just -- yes.

14 INTERPRETER: About 200.

15 Q. Were other topics discussed at the meeting, or just the
16 subject of the deposition?

17 INTERPRETER: We had a regularly scheduled members
18 meeting. It was a career meeting, and at the end, we just
19 provided information to the members about this.

20 Q. Was present at the meeting?

21 A. Yes.

22 Q. Was any discussion regarding your specific testimony
23 mentioned at the meeting?

24 INTERPRETER: I -- you know, we really didn't -- don't
25 have a clear picture, you know, what would be discussed, so

1 we just had a short discussion and a prayer about it.

2 Q. Okay. I would like to talk a little bit about your
3 present employment. Where do you currently work?

4 INTERPRETER: Right now, I am unemployed. The company
5 that I worked for went out of business.

6 Q. What was that company?

7 A.

8 INTERPRETER:

9 THE WITNESS:

10 INTERPRETER:

11 Q. How long ago did stop existing?

12 INTERPRETER: December 31, 2008 was the last year.

13 Q. And have you worked since then?

14 A. No.

15 Q. Do you have any role with the

16

17 INTERPRETER: I am a vice pastor.

18 Q. And how long have you had that position?

19 INTERPRETER: For about four years now.

20 Q. What are your responsibilities as a vice pastor?

21 INTERPRETER: I conduct services. I help pastor the
22 services. I visit ill people. Go to hospitals after
23 surgeries. I just take care of the spiritual needs of the
24 people.

25 Q. And did you have that position in the year 2009?

1 INTERPRETER: Yes.

2 Q. Approximately how many hours per week do you devote to
3 your role as the vice pastor?

4 INTERPRETER: It's hard to say, frankly. I never
5 counted. I never kept track of it, how many hours.

6 Q. Okay.

7 INTERPRETER: I -- you know, it could be three, four,
8 five hours per day. It really depends.

9 Q. Okay.

10 INTERPRETER: We have a lot of elderly members.

11 Q. Okay. How many parishioners or church goers are there,
12 for an average service at the church?

13 INTERPRETER: Can I decline to respond to that, or --

14 MR. PIDGEON: I mean, you should -- in my opinion, you
15 should answer it.

16 INTERPRETER: Because under -- you know, we just have --
17 we never told anyone, in our practice, before, how many
18 people attend church.

19 Q. (BY MR. DIXSON) I am not looking for an exact number,
20 nor the identity of any member of the church.

21 INTERPRETER: On Sunday services, between seven to 800.

22 Q. And would that be the same as attended the church in
23 2009?

24 INTERPRETER: Yes.

25 Q. Does the church maintain a church newsletter or a

1 website?

2 INTERPRETER: There is no newsletter, but there is a
3 website.

4 Q. Who is responsible for the content posted on the church
5 website?

6 INTERPRETER: Now people change. There was a person who
7 was responsible. He went to a different church.

8 Q. Okay. Is either yourself or responsible
9 for the content on the church website?

10 INTERPRETER: is responsible.

11 Q. Does post the content himself, or does
12 he use someone to post his messages?

13 INTERPRETER: There is -- the way it usually happens,
14 there is a meeting. There is a number of people involved.
15 People responsible for the video. People responsible for
16 other content. And they discuss what goes on, and, at times,
17 he consults us; you know, what we should put and what we
18 should not put.

19 Q. Prior to working for , did you have another
20 occupation in the United States?

21 INTERPRETER: I worked for six months. It was a seasonal
22 work, and it was in a hot house. And I worked there until
23 December 31st, and as of January 5th, I started working at
24 . And I worked there for five years.

25 Q. What year did you come to the United States?

1 INTERPRETER: 2003.

2 Q. Did you come straight to Spokane?

3 A. Yes.

4 Q. And have you become a United States citizen since living
5 here?

6 INTERPRETER: Yes.

7 Q. And what year was that?

8 INTERPRETER: A year and a half ago. I believe it was in
9 '09.

10 Q. And are you a registered Washington voter?

11 INTERPRETER: Yes.

12 Q. Do you remember when you first became a registered
13 Washington voter?

14 INTERPRETER: My first time was when we voted on the 71.

15 Q. Okay. So you had not voted in a Washington election
16 prior to November 2009, correct?

17 INTERPRETER: No.

18 Q. No; that's incorrect? Or, no, you had not?

19 MR. PIDGEON: I knew I should have objected to the form
20 of that question.

21 INTERPRETER: No, I did not vote. I did not have a right
22 to do that before that.

23 Q. (BY MR. DIXSON) Okay. Do you remember a particular
24 month, in the year 2009, when you became a registered voter?

25 INTERPRETER: There was discussion before that, but, you

1 know, the vote was in November, so, probably, shortly before
2 November, or right in November.

3 Q. So the fall season of 2009?

4 INTERPRETER: The fall. Yes.

5 Q. When did you first learn that you had been named as a
6 witness in the Referendum 71 lawsuit?

7 INTERPRETER: Do you mean, about today's meeting?

8 Q. No. There was a witness list prepared by the plaintiffs
9 in late August or early September 2010. When did you first
10 learn that you were named as a witness on that list?

11 INTERPRETER: Jessica called on September 16th.

12 THE WITNESS: 16th.

13 Q. Prior to your conversation with Jessica Hamilton, were
14 you aware that you had been named as a witness in this
15 lawsuit?

16 INTERPRETER: No.

17 Q. Prior to speaking with Ms. Hamilton in September 2010,
18 had you spoken to any attorneys regarding the Referendum 71
19 lawsuit?

20 INTERPRETER: No.

21 Q. Were you surprised to find out that you had been named as
22 a witness in this lawsuit?

23 INTERPRETER: Yes.

24 Q. Do you understand that as a named witness in a federal
25 trial, you may be required to testify in federal court

1 regarding your experiences? Do you have any concerns about
2 testifying in public regarding Referendum 71?

3 INTERPRETER: What do you mean, specifically? Like, for
4 me appearing in court, or, I mean, what?

5 Q. Yes. If you were required to be in court, would that --
6 would you have any concerns about appearing in court as a
7 witness?

8 INTERPRETER: Well, I am sure it's not the most pleasant
9 procedure.

10 Q. Do you have any concerns about your physical or mental
11 health regarding testifying in federal court?

12 INTERPRETER: Hard to say.

13 Q. Okay. When did you first learn about Referendum 71?

14 INTERPRETER: It was the beginning of the fall in '09.

15 Q. And I should back up. Do you understand what I mean when
16 I say Referendum 71?

17 INTERPRETER: You are talking about the votes on this
18 issue, right?

19 Q. I am, right now, talking, in particular, about the actual
20 petition for Referendum 71, and not the actual November vote.

21 INTERPRETER: You talking about the times when they are
22 gathering signatures, right?

23 Q. Yes.

24 INTERPRETER: So, what is your question? Dates and
25 times, or if I knew what I was doing? What's the --

1 Q. In general, when did you first become involved with
2 Referendum 71? If that means gathering signatures, yes; when
3 did that first occur?

4 INTERPRETER: So, in November, there is a voting. So I
5 would say, the summer.

6 Q. How -- who first told you about Referendum 71, or how did
7 you first learn about Referendum 71?

8 INTERPRETER: We had meetings. We had meetings.

9 Q. Meetings at the church?

10 INTERPRETER: We had unscheduled meeting in our church.
11 It was not a regularly schedule meeting.

12 Q. Do you remember when that was?

13 INTERPRETER: It was sometime in the summer. I don't
14 know the specific date.

15 Q. Who was at that meeting?

16 INTERPRETER: , and I don't remember who else.

17 Q. Was at that meeting?

18 INTERPRETER: Yes.

19 Q. How many people, approximately, were at that meeting?

20 INTERPRETER: It wasn't just people from our church. It
21 was Slavic people in the area. Maybe 80 to a hundred people.

22 Q. Who organized the meeting?

23 INTERPRETER: I think, probably, .

24 Q. Did you help to organize the meeting?

25 INTERPRETER: I did not help to set up the meeting, but

1 gathering signatures, sure.

2 Q. Do you know how people were invited to attend that
3 meeting?

4 INTERPRETER: Can you repeat that? I have a problem
5 translating.

6 Q. Yes. Do you know how people were invited to attend that
7 meeting?

8 INTERPRETER: People were called -- people who knew the
9 neighbors, and those who -- and those who wanted to attend.
10 It was a voluntary meeting, and those who wanted to attend,
11 did.

12 Q. Where did the meeting take place?

13 INTERPRETER: In our church.

14 Q. Who spoke at the meeting?

15 INTERPRETER: . I don't remember the names.
16 Some other people. It was just purely informational.

17 Q. What did tell those people at the meeting?

18 INTERPRETER: That meeting was, the issue of gathering
19 signature was discussed, so there will be voting on this
20 issue.

21 Q. Do you remember anything else from that initial meeting
22 with ?

23 A. No.

24 Q. Approximately how long did that meeting last?

25 INTERPRETER: Maybe a couple hours.

1 Q. Had you had any interaction with prior to that
2 meeting?

3 INTERPRETER: Personally, I didn't, because I have a
4 language barrier.

5 Q. Did you know who was, prior to this meeting?

6 A. No.

7 Q. Did you have any participation with Senate Bill 5688 in
8 the Washington State legislature?

9 INTERPRETER: What is that?

10 Q. It was a bill that expanded same sex rights to domestic
11 partnerships, and led to Referendum 71.

12 INTERPRETER: As far as I understood, that's why the
13 signatures were gathered. Right?

14 Q. Yes.

15 INTERPRETER: You know, the information we got, you know,
16 how this law was going into effect.

17 Q. And that was at the meeting with in the summer
18 of 2009?

19 INTERPRETER: Yes.

20 Q. Okay. We will talk about the signature gathering in just
21 a second.

22 In support of Referendum 71, did you attend any public
23 rallies or gatherings?

24 INTERPRETER: Well, we had separate meetings in the
25 church, and we had meetings where we discussed that. Yes.

1 Q. Any public participation outside of the church?

2 INTERPRETER: So you are talking about gathering
3 signatures, right?

4 Q. No. It would be, in English, a public rally or a public
5 gathering in support of Referendum 71. Like, a Town Hall or
6 a public speaking.

7 INTERPRETER: I think there was a meeting once, in the
8 DoubleTree Hotel.

9 Q. Okay. Anything outside, where people used microphones,
10 or attended any type of rally?

11 INTERPRETER: No.

12 Q. Did you ever hold up campaign signs in support of
13 Referendum 71?

14 INTERPRETER: Yes.

15 Q. On how many occasions?

16 INTERPRETER: Personally, me, you mean. Right?

17 Q. Correct.

18 INTERPRETER: Maybe a couple times, I was there at the
19 intersection and holding up the sign.

20 Q. The same intersection both times?

21 INTERPRETER: Yes. The same.

22 Q. And what intersection was that?

23 INTERPRETER: Crestline and Wellesley.

24 Q. How did you choose that location?

25 INTERPRETER: I don't remember. I just walked to it.

1 Q. Were you by yourself or with a group of people?

2 INTERPRETER: It was my family with me.

3 Q. And was this your idea to do so, or did someone instruct
4 you to be at that intersection?

5 MR. PIDGEON: Objection, as to the form of the question.

6 MR. DIXSON: You can answer.

7 INTERPRETER: It was my idea. Nobody made me do it or
8 talked me into it. And it was a desire of my family. I did
9 not ask or make anyone to do it.

10 Q. (BY MR. DIXSON) I am not asking about any particular
11 family members or their identities, but how many of you were
12 out on the intersection?

13 INTERPRETER: Four people.

14 Q. Did everyone have signs?

15 INTERPRETER: We had two signs, and they were nearby me.

16 Q. Did you donate to any political action committees in
17 support of Referendum 71?

18 INTERPRETER: I think -- and I don't remember the
19 amount -- but I think the church did some support.

20 Q. Did you personally donate to any political action
21 committees?

22 INTERPRETER: No.

23 MR. DIXSON: Ozzie, this is going to be Exhibit 1.

24 (Ex. No. 1, marked.)

25 Q. (BY MR. DIXSON) I am handing you what has been marked as

1 Exhibit 1 to your deposition. This is a document from the
2 Washington State Public Disclosure Commission. If you can
3 turn to the page labeled Page No. 5, in the upper right-hand
4 corner. In looking at the bottom line on that page, there is
5 an entry for the . Is that your
6 church?

7 A. Yes.

8 Q. And there is an entry for \$1,000. Is that correct?

9 INTERPRETER: It could be true. I don't remember the
10 specific amount. It's quite possible.

11 Q. Okay. Did you assist the church in collecting money for
12 the contribution to the political action committee?

13 INTERPRETER: No. This was just given from the church.

14 Q. Was there a special collection for this, or did it come
15 from the general donations from the parishioners?

16 INTERPRETER: No. It was --

17 MR. PIDGEON: Objection to relevance.

18 INTERPRETER: It was just from the general. And then,
19 also, people could have -- also were allowed to just give,
20 themselves.

21 MR. PIDGEON: One note for the record. Just for the sake
22 of the flowing of the conversation, I would like, if I have
23 an objection to the question, I would like to be able to
24 enter the objection after he answers. In other words, I
25 don't want to lose my objection, but I don't want to

1 interrupt his answer, either.

2 MR. DIXSON: That's fine with me.

3 MR. PIDGEON: Okay.

4 Q. (BY MR. DIXSON) Did you participate in any radio or
5 television interviews regarding Referendum 71?

6 INTERPRETER: No.

7 Q. Did you appear, to your knowledge, in any newspaper or
8 Internet websites regarding Referendum 71?

9 INTERPRETER: No.

10 Q. And to your knowledge, is your name publicly associated
11 with Referendum 71, in any form?

12 INTERPRETER: I really don't think that, you know, my
13 name is that loud, and is really involved.

14 Q. Okay. So the answer would be "no"?

15 INTERPRETER: No.

16 MR. PIDGEON: Objection as to form.

17 Q. (BY MR. DIXSON) Are you aware that after the petitions
18 were circulated and submitted to the Secretary of State's
19 office, the Secretary of State had to conduct a counting and
20 verification process in Olympia?

21 INTERPRETER: Yes. I know that votes should have been
22 counted. Yes.

23 Q. Not the votes, but the actual number of people who signed
24 the petition?

25 INTERPRETER: Yes. I mean, I know it should be counted.

1 Q. Okay.

2 INTERPRETER: Yeah. There is known that we needed a
3 certain amount of people to sign off.

4 Q. Did you participate in observing the signature counting
5 in the Secretary of State's office?

6 INTERPRETER: No.

7 Q. Do you know anyone who did?

8 INTERPRETER: I don't know, for sure, but maybe Matt
9 Shea.

10 Q. To your knowledge, did anyone from your church
11 participate in the signature verification process?

12 INTERPRETER: What do you mean, specifically?

13 Q. Did anyone from your church, to your knowledge, travel to
14 Olympia to oversee the signature verification process?

15 INTERPRETER: No.

16 Q. Have you heard anything about the signature verification
17 process?

18 INTERPRETER: I -- well, we heard about the process going
19 on. We had people raising different concerns about it. I
20 mean, just in general, we just tried to follow it.

21 Q. Did anyone tell you about particular concerns with the
22 process?

23 INTERPRETER: Well, I mean, I was concerned myself, which
24 way it was going to go.

25 Q. Regarding whether or not you had, in fact, gathered

1 enough signatures to put the measure on the ballot?

2 INTERPRETER: Yes.

3 Q. Did you have any particular concerns that the Secretary
4 of State's office was making errors in the counting process?

5 INTERPRETER: Hard to say. I don't know those people.

6 Q. But you were not aware of any particular concerns
7 regarding the verification process?

8 INTERPRETER: What do you mean?

9 Q. Did anyone tell you that they had concerns regarding
10 errors being made by the Secretary of State during the
11 verification process?

12 INTERPRETER: No. Nobody told me anything like that;
13 specifically that, you know, there was something like that
14 going on.

15 Q. Other than your participation in gathering signatures and
16 holding signs, did you have any other involvement with
17 Referendum 71?

18 INTERPRETER: No.

19 Q. I want to talk about the signature gathering process.
20 Did you help gather signatures for Referendum 71?

21 INTERPRETER: Yes.

22 Q. Did you, in fact, sign the Referendum 71 petition?

23 INTERPRETER: Yes.

24 Q. Where were you when you signed the petition?

25 INTERPRETER: At home.

1 Q. Okay. Who asked you to help gather signatures?

2 INTERPRETER: It was my own desire.

3 Q. Was this -- was the signature gathering effort something
4 you discussed with the members of the church?

5 INTERPRETER: Yes. We had a special meeting. Those
6 people who wanted to attend it, and people who wanted to sign
7 the petition, they did. There is no, you know, talking
8 people into, or, you know, making them do that, or anything
9 like that.

10 Q. So people signed the petition at this special meeting,
11 correct?

12 INTERPRETER: No. People would take them with them.

13 Yes.

14 Q. Okay. What was the church's plan to gather signatures?

15 INTERPRETER: Well, we wanted for a Biblical family to be
16 preserved.

17 Q. What do you mean by Biblical family?

18 INTERPRETER: God created man and a woman, and he blessed
19 them, and we believe in Biblical marriage as of today.

20 Q. Do you define Biblical marriage to be marriage between
21 one man and one woman?

22 A. Yes.

23 INTERPRETER: Yes.

24 Q. Okay. How did the church plan to gather signatures?

25 INTERPRETER: What do you mean, how we planned?

1 Q. Did you have specific locations which you were instructed
2 to go to, to gather signatures?

3 INTERPRETER: No. Everyone did it on his own. Wherever
4 the person lives, or --

5 Q. So there was no overall church plan to gather signatures.
6 It was left to each member on his own?

7 INTERPRETER: Right. There was no specific plan where,
8 you know, I am supposed to go to south hill, or someone else
9 was supposed to go to north side. No. There was no such
10 form. It was at the personal discretion. People who wanted
11 to, they took the paperwork and --

12 Q. Okay. Let's talk about your personal signature
13 gathering. How many times did you collect signatures?

14 INTERPRETER: I don't remember exactly how many times,
15 but there was one sheet. I think there was -- I think there
16 was, like, 30 entries on the number of sheets that I have,
17 and what I did, you know, I approached people with the
18 interpreter, and explained the issue, and if they wanted to
19 sign, they did sign. If they didn't want to sign, you know,
20 they did not sign. And I believe that it got filled out
21 completely.

22 Q. So you personally were responsible for gathering
23 signatures for one full petition, correct?

24 INTERPRETER: I took that responsibility on myself. I
25 wanted to, and I did do that.

1 Q. Okay. I am just trying to establish how many petitions
2 you were personally responsible for, and I believe that that
3 is one petition, correct?

4 INTERPRETER: One petition.

5 Q. Where did you go to gather signatures?

6 INTERPRETER: On a street where I live.

7 Q. Did you go to any public places, such as grocery stores
8 or large retail stores or a mall?

9 INTERPRETER: No. I did not go to those.

10 Q. So you gathered signatures in your neighborhood, correct?

11 INTERPRETER: Yes.

12 Q. You mentioned that you had a translator with you. Why
13 did you bring a translator?

14 INTERPRETER: In order -- in order to properly explain,
15 you know, the petition, we would give them the petition, and
16 I couldn't explain, but the translator could. And after the
17 explanation, either people signed, or they declined to sign.

18 Q. Besides yourself and the translator, was anyone else with
19 you when you gathered signatures?

20 INTERPRETER: I don't think so. No.

21 Q. Are you able to read English?

22 INTERPRETER: I do read. I read.

23 Q. So, were you personally aware of what the referendum
24 said, that you were asking other people to sign?

25 INTERPRETER: Well, maybe not, like, exactly 100 percent,

1 but I did understand what it was asking for. Yeah. What I
2 mean is, you know, maybe by just reading, I would not get
3 exactly 100 percent, but I did understand what it was about.

4 Q. And do you have an estimate of how many times you went
5 out in the neighborhood to gather signatures?

6 INTERPRETER: Maybe five, maybe six times.

7 Q. Did you have a Referendum 71 yard sign in your yard?

8 INTERPRETER: Yes. Up front.

9 Q. Did you have a Referendum 71 bumper sticker on your car?

10 INTERPRETER: No.

11 Q. Outside of gathering signatures in the neighborhood, did
12 you personally have any other efforts to gather signatures?

13 INTERPRETER: We had small brochures that we placed by
14 the people's doors, outside.

15 Q. So you would leave brochures at people's doors if they
16 were not home when you went to gather signatures?

17 INTERPRETER: Yes. Yes. We would walk by and just leave
18 them there.

19 Q. Were the brochures in English or in Russian?

20 INTERPRETER: In English.

21 Q. Were the petitions available for signature at the church?

22 INTERPRETER: What do you mean, petition?

23 Q. The same petition that you took around the neighborhood
24 to gather signatures, were additional copies available at the
25 church?

1 INTERPRETER: Maybe it was available. Some did fill it
2 out there, or put his name there.

3 Q. Did you see people sign the petitions at the church?

4 INTERPRETER: I could have happened. I mean, like, I was
5 responsible for 30 signatures, and people could have come up
6 and see if I could put the name in.

7 Q. Okay. But there was no organized signature gathering at
8 the church?

9 INTERPRETER: There was no concrete time or place set at
10 the church, you know, for signatures. Mostly, what happened,
11 people took the petitions and, you know, went out and signed
12 it at their time and place.

13 Q. Did one person gather all of the signed petitions to send
14 them to the Secretary of State's office once they had been
15 compiled?

16 INTERPRETER: Yes. Someone was responsible for gathering
17 all of the petitions and turning them in.

18 Q. Do you remember who that was?

19 A. No.

20 Q. Do you know how many petitions that members of the
21 church, in total, gathered and sent to the Secretary of
22 State?

23 INTERPRETER: I don't know the exact number.

24 Q. Do you think it was more than 20 sheets?

25 INTERPRETER: I think there was more.

1 Q. More than a hundred sheets?

2 A. I don't know.

3 INTERPRETER: I think there was more than a hundred.

4 Q. More than 200?

5 INTERPRETER: I cannot say for sure, because I don't know
6 the exact number.

7 Q. But you are pretty sure, not knowing the exact number, it
8 was more than 100?

9 INTERPRETER: Yes.

10 Q. Did you or speak about Referendum 71
11 during church services?

12 INTERPRETER: We don't talk about those things during
13 regular service. You know, we pray, we sing and we preach.
14 We don't discuss any other issues, and that's our regular
15 approach.

16 Q. I understand that you allege that you have suffered some
17 harassment as a result of your participation with Referendum
18 71?

19 MR. PIDGEON: Objection as to form.

20 Q. (BY MR. DIXSON) And I would like to talk about that now.

21 A. Uh-huh.

22 Q. Can you tell me about any harassment, threats or
23 reprisals that you have suffered, or are aware of, regarding
24 Referendum 71?

25 INTERPRETER: Are you talking of, just personally, me, or

1 in general, or --

2 Q. We will do both, but I want to start with you,
3 personally.

4 INTERPRETER: Personally, about me.

5 Q. Can you tell me -- and we will take time to go through
6 each incident -- but beginning where you want to begin,
7 describe any personal harassment.

8 INTERPRETER: So, talking personally about me. So,
9 personally, to me, there was no, you know, physical damage or
10 nothing was broken. That did not happen. I had that sign up
11 front, and it was still there. The only thing that --
12 stickers with swear words were placed on my vehicle, and as
13 far as it's been connected to this, you know, I couldn't say
14 exactly.

15 Q. When, if you remember, did you first place the yard sign
16 in your front yard?

17 INTERPRETER: When the process started. Probably
18 October.

19 Q. And there was no damage done to that sign, correct?

20 INTERPRETER: No. It was there.

21 Q. Turning to the stickers with the swear words, where were
22 these stickers placed?

23 INTERPRETER: On the windshield, on two different
24 vehicles.

25 Q. The windshield of your personal cars, correct?

1 A. Yes.

2 Q. Two separate cars?

3 INTERPRETER: Yes.

4 Q. How many stickers were placed on each car?

5 INTERPRETER: It was two or three stickers.

6 Q. On each car, or in total?

7 INTERPRETER: No. In total.

8 Q. When did you find these stickers?

9 INTERPRETER: Two, two and a half months ago.

10 Q. Okay. So, in the summer of 2010, correct?

11 INTERPRETER: Yes.

12 Q. And I know it may be unpleasant, but do you recall what

13 was written on the stickers?

14 INTERPRETER: I did not understand the words, exactly,

15 but when my son looked at that, he was, like, Dad, where did

16 you get this?

17 Q. Were the stickers written in English?

18 INTERPRETER: Yes.

19 Q. Approximately how big were the stickers?

20 INTERPRETER: It was the yellow sticky note, actually.

21 It's one where you peel off and stick on. So it was a square

22 size.

23 Q. We would call it a Post-it note.

24 INTERPRETER: Yes.

25 MR. PIDGEON: Let the record reflect, he indicated the

State Objects: Witness lacks foundation for the testimony; hearsay; and the testimony is irrelevant even if not offered for the truth of the matter.

1 size about maybe two by two. Two by two inches.

2 INTERPRETER: Yes.

3 Q. (BY MR. DIXSON) Do you believe that those stickers were
4 related to your position with regards to Referendum 71?

5 INTERPRETER: I couldn't say that for a hundred percent,
6 because I did not see who done it. I don't know. Even
7 though I resided there for four years, and I had no issues
8 with the neighbors, and --

9 Q. Were any stickers placed on your vehicles around the time
10 of the signature gathering or the November 2009 election?

11 INTERPRETER: No.

12 Q. Do you recall, from what your son told you, what was
13 actually written on any of the stickers?

14 INTERPRETER: He just told me that it was very bad
15 swearing words, and, so, I tore it up and threw them in the
16 garbage.

17 Q. Did you think they were directed to you, personally?

18 INTERPRETER: Yes.

19 Q. Why do you think that?

20 INTERPRETER: Because I did not see stickers like that at
21 my neighbors' vehicles.

22 Q. Did your son tell you if the stickers said anything about
23 Referendum 71 or Biblical marriage?

24 INTERPRETER: No.

25 Q. I would like to talk about -- strike that.

State Objects: Witness lacks foundation for the testimony; hearsay; and the testimony is irrelevant even if not offered for the truth of the matter.

1 Outside of the stickers, is there any personal harassment
2 that you allege you suffered, that we have not discussed here
3 today?

4 INTERPRETER: Personally, me, no. But, you know, when
5 our youth was out in the city with the signs, and they were
6 swore at, spat at, middle fingers were shown to them.

7 Q. Okay. And I want to talk about harassment that you
8 didn't suffer personally, but you are aware of. And it is
9 important that we talk about each incident, if you can
10 separate them separately.

11 So, in whatever order you would like to tell me about
12 them, please tell me about any harassment that you are aware
13 of, but did not suffer personally.

23 Q. Was part of a large group that was waving
24 signs?

25 INTERPRETER: Yes.

1 Q. Approximately how many people were in the group, if you
2 know?

3 INTERPRETER: I don't know, exactly, the number, but it
4 was a group of people. So, after that incident, you know, we
5 asked the youth not to be in the small groups, like of, you
6 know, like, a couple people, but more like six or eight so
7 they would feel safer.

8 Q. Were youth from your church present with in
9 October of 2009?

10 INTERPRETER: No. No. It was a group from a different
11 church, and usually, groups from the same church, you know,
12 went out.

13 Q. What's the name of church?

14 INTERPRETER: I don't know the name of the church. I
15 know it's a church of .

16 Q. In Spokane?

17 A. Yes.

18 Q. Do you know the address or anything?

19 INTERPRETER: I don't know.

20 Q. Do you know personally?

21 INTERPRETER: No. Personally, I do not.

22 Q. How did you learn about what happened to ?

23 INTERPRETER: Well, I mean, it was just -- it just spread
24 among the Slavic group, and it was a little tense time, at
25 that time, so it was discussed.

State Objects: Witness lacks
foundation; hearsay; and irrelevant

1 Q. Do you know if the woman who took the sign said anything
2 to ?

3 INTERPRETER: I don't know what was exchanged,
4 conversation-wise. I just know that he was hit.

5 Q. Did you see with the stitches, following the
6 incident?

7 INTERPRETER: No. Personally, I did not. Personally, I
8 did not.

9 Q. But you have never --

10 INTERPRETER: Because we are in different churches.

11 Q. And you have never personally met ?

12 INTERPRETER: With his , I did. The one
13 who is a pastor.

14 Q. Did you talk to about the incident?

15 INTERPRETER: I personally did not. There is actually a
16 letter in which he described what happened.

17 Q. Can you tell me more about the letter? Who wrote it?

18 INTERPRETER: . . He
19 wrote this letter, and he even said he could come and
20 testify, if needed to, and to tell it in detail, how it
21 happened.

22 Q. When was the letter written?

23 INTERPRETER: Yesterday or day before. He found out that
24 we had been called as witnesses to this, and he found out
25 that we needed some information, and he was ready to come and

1 testify.

2 Q. Have you seen the letter, or just told you that
3 he wrote a letter?

4 INTERPRETER: I saw the letter. I personally saw the
5 letter yesterday.

6 Q. Do you know if , or anyone else in that youth
7 group, said anything to the woman, prior to her striking
8 ?

9 INTERPRETER: From what I know, he asked her, why are you
10 tearing the signs down?

11 Q. And do you know what she said to him?

12 INTERPRETER: No. Well, she responded with (indicating.)

13 Q. So, to your understanding of the incident, a group of
14 youth were waving Referendum 71 signs?

15 INTERPRETER: Yes.

16 Q. A woman approached the group and grabbed -- and began to
17 take down the signs?

18 INTERPRETER: From what I understand, one of them was,
19 like, sticking in the ground.

20 Q. And she -- did she pick up a sign that was in the ground,
21 or did she take a sign from someone who was holding it?

22 INTERPRETER: From the way I understood it, it was staked
23 into the ground.

24 Q. And there -- and asked her, why are you
25 taking the sign out?

1 INTERPRETER: Yes.

2 Q. And then she struck him on the head with the sign?

3 INTERPRETER: Yes.

4 Q. Do you -- and went to the hospital, correct?

5 INTERPRETER: Yes. And he had six stitches in his head.

6 Q. How do you know the number of stitches?

7 INTERPRETER: That is what it says in the letter.

8 Q. So you know that from the letter, correct?

9 INTERPRETER: Yes. I saw the letter yester

Q. Do you know what hospital went to?

10 Q. Do you know what hospital went to?

11 INTERPRETER: I don't know what hospital.

12 Q. Did anyone say anything to the woman after she struck
13 ?

14 INTERPRETER: I don't have any knowledge what happened
15 afterwards, what actions were taken, or anything like that.
16 I don't know.

17 Q. Do you know if _____ filed a report with the police
18 regarding this incident?

19 INTERPRETER: No. He did not do that.

20 Q. You know for a fact that he did not file a report?

INTERPRETER: I heard that police was not called

22 Q. Did anyone tell you, or have you come to know, why the
23 police were not called?

24 INTERPRETER: I don't know the reasons why the police was
25 not called

1 Q. Is there anything else about the incident with
2 that you would like to tell me, that I haven't
3 asked you?

4 INTERPRETER: No. I said everything.

5 Q. Outside of the incident with , are you aware
6 of any other incidents regarding Referendum 71?

7 INTERPRETER: The incident where -- like I stated in the
8 beginning -- where our youth was standing -- should I repeat
9 that?

10 Q. Yes.

11 INTERPRETER: At a number of times when our youths would
12 be standing out with the signs, they were sworn at, spat at,
13 and middle fingers were shown to them, and I did verify that
14 with the youth.

15 Q. Okay. Did these incidents -- are they separate
16 incidents, or was the swearing and the spitting all together?

17 INTERPRETER: It was at different times. Our youth went
18 out a number of times, and they would gather in groups, and
19 would be out there with signs.

20 Q. Are these youth from your church, or youth from other
21 churches?

22 INTERPRETER: From our church. Yes.

23 Q. Were you ever present when the youths were gathered and
24 waving the signs?

25 INTERPRETER: I wasn't present, physically, but I drove

1 by locations where our youth was standing.

2 Q. When you -- did you personally observe any spitting or
3 swearing at the youths when you drove by?

4 INTERPRETER: No. Personally, I did not see that.

5 That's from the words of the youth.

6 Q. Can you estimate for me how many times the youth were
7 spit at or sworn at or had middle fingers raised?

8 INTERPRETER: I recently talked to a person. I don't
9 want to, you know, mention his name, because he is not an
10 adult yet. From what he told me, it was quite frequent.

11 Q. Can you provide any greater detail about any of these
12 particular incidents?

13 INTERPRETER: No. I can't provide anything more.

14 Q. Do you know if the youths were who were spit at or sworn
15 at contacted the police regarding what had taken place?

16 INTERPRETER: No. They did not report that to the
17 police.

18 Q. Do you know why they would not report that to the police?

19 INTERPRETER: I don't know. Maybe they got used to it
20 or --

21 Q. Prior to the youths going out to wave signs, did you, or
22 anyone from the church, provide them instructions on where to
23 go or what to do?

24 INTERPRETER: We had a discussions with them, you know,
25 about it, but as far as actual location, they would choose

1 themselves. Either by the church, or on Division and
2 Wellesley. But the sign that was by our church, on the
3 church's property, was taken down numerous times.

4 Q. Are there any other incidents, that you are aware of,
5 with the youth and the sign waving, that you haven't told me
6 about today?

7 INTERPRETER: No.

8 Q. Did people report -- did the youths report these
9 incidents directly to you, or did you learn about them
10 through the members of your church and Slavic community?

11 INTERPRETER: Well, sometimes they -- some of them told
12 it to me directly. Sometimes they, in the group meetings,
13 you know, when the service would end, you know, would
14 communicate among each other and talk about it.

15 Q. Informally, you learned about these incidents?

16 INTERPRETER: You know, I did not, like, collect this
17 information, because I did not have a thought in my mind that
18 I would -- sometime later, would need that information.

19 Q. Okay. You mentioned that there was a Referendum 71 sign
20 on the church property that was removed. Correct?

21 INTERPRETER: Yes.

22 Q. Was the sign simply taken and moved, or was it broken, or
23 damaged, or otherwise defaced?

24 INTERPRETER: A number of times, it happened -- at
25 minimum, happened three times, and, usually, what happened,

1 the sign would be torn off, but the stake that was in the
2 ground, you know, would still be there.

3 Q. Did you witness anybody tearing the sign off?

4 INTERPRETER: Personally, I did not.

5 Q. Do you know anyone from the church who saw the sign get
6 ripped off?

7 INTERPRETER: No. We just saw the fact that it's gone.

8 Q. Did the -- was anything -- any notes or other messages
9 left on the stake, or anywhere else around the church
10 property?

11 INTERPRETER: No. It was just a broken sign. That's it.

12 Q. Did you, or anyone from the church, contact the police
13 regarding the broken sign?

14 INTERPRETER: No.

15 Q. Why not?

16 INTERPRETER: We are not used to do those things for
17 things of that nature. You know, if it was, like, you know,
18 some big crime, sure. We would just put a new sign in.

19 Q. Outside of the incident with , the youths
20 holding the signs, and the sign on the church property, are
21 you aware of any other harassment related to Referendum 71,
22 that you have not told me about today?

23 INTERPRETER: No. That's it, pretty much.

24 Q. Since the election in November 2009, are you -- have you,
25 or anyone you know, suffered harassment related to

1 Referendum 71?

2 INTERPRETER: No. I am not aware of that. That, or any
3 threats, or anything like that.

4 Q. Did you, at any time, feel personally unsafe based upon
5 your participation with Referendum 71?

6 INTERPRETER: Well, there was some feeling, you know,
7 which I was going to go, but --

8 Q. Can you explain? I guess I am unclear as to that answer.

9 INTERPRETER: There was some time when it was tense, but
10 there was no, like, you know, specific threats to me, or
11 anything like that.

12 Q. What made you feel tense?

13 INTERPRETER: I can't really explain it, but it's just a
14 feeling.

15 MR. DIXSON: And I think I am done for now, if you have
16 any questions.

17 EXAMINATION

18 BY MS. EGELER:

19 MS. EGELER: Can you hear me all right? This is Anne
20 Egeler, and I am a deputy solicitor general with the Attorney
21 General's Office, and I am representing Secretary of State
22 Sam Reed in this litigation.

23 Sir, can you tell me what your residential address is?

24 INTERPRETER: .

25 Q. Okay. And can you tell me how to spell ? You

1 were referring to a . Can you spell that
2 name for me?

3 A. , maybe.

4 INTERPRETER: I would guess it's

5 Q. And would be ?

6 INTERPRETER: I am sorry. I lost you there.

7 Q. Is

8 INTERPRETER: Yes. Yes, but sometimes he just writes it
9 down as

10 Q. And you also referred to an . Was that
11 son?

12 INTERPRETER: No. It's his nephew.

13 Q. And is his full name ?

14 INTERPRETER:

15 Q. Is his full name

16 INTERPRETER: This is the interpreter speaking.

17 would be a patronymic. But if it's a first name,
18 it would be .

19 Q. Okay. During the time of -- at any time in 2009, was
20 there any vandalism or damage done to the church?

21 INTERPRETER: No. Except, you know, the tearing down of
22 the sign. No.

23 Q. Have there ever been, at any time he is aware of, any
24 other political signs that have ever been posted at the
25 church?

1 INTERPRETER: I don't think so.

2 0. Okay. Do you have an address for

3 INTERPRETER: No.

4 Q. Do you know whether he lives in Spokane?

5 INTERPRETER: Yes. He lives in Spokane.

6 Q. So he does not live in Cheney?

INTERPRETER: Well, I mean, I don't know if he lives in
Cheney or not, but, I mean, he is in Spokane.

9 Q. Okay. And I missed part of it, I think. Is
10 associated with another church?

11 INTERPRETER: Yes. He is a pastor of a different church.

12 Q. And what is the name of that church?

13 INTERPRETER: I don't know.

14 Q. Where is that church?

15 INTERPRETER: It's in Spokane. I have never been to the
16 church.

17 Q. Do you know what type of church it is?

18 INTERPRETER: It's a

19 Q. Okay. Have you ever met ?

20 INTERPRETER: Yes

21 0. When?

22 INTERPRETER: He called me a few days ago, not related to
23 this case. He works as a Realtor, so he called me on a
24 different subject.

25 Q. And how did you learn that he had an incident related to

1 Referendum 71?

2 INTERPRETER: I saw that letter yesterday, that he wrote
3 up.

4 Q. Who was the letter addressed to?

5 INTERPRETER: To .

6 Q. Do you know if it was mailed to the church?

7 INTERPRETER: No. I believe it was transferred via
8 e-mail to him.

9 Q. And you were asked to bring any documents that evidenced
10 any harassment or threats that you were aware of. Why did
11 you choose not to bring this e-mail?

12 INTERPRETER: Well, it's not addressed to me.

13 MR. PIDGEON: Objection, as to the form of the question.

14 MS. EGELER: I have no further questions.

15 MR. PIDGEON: I have a few follow-ups.

16 You still need to translate everything he says.

17 INTERPRETER: Peace to you. Our Lord.

18 MR. PIDGEON: Okay. A couple questions.

19 THE WITNESS: Okay.

20 EXAMINATION

21 BY MR. PIDGEON:

22 Q. Now, on the website of the church, are you listed on that
23 website?

24 INTERPRETER: Yes. Yes, sir.

25 Q. Are you identified as a pastor of the church?

1 INTERPRETER: Yes. Like, as a vice pastor. Maybe you
2 find my preachings there, too.

3 Q. And is also identified on this website?

4 INTERPRETER: Yes.

5 Q. Okay. And is your name also in the phone book?

6 INTERPRETER: Yes.

7 Q. And is your address in the phone book, as well?

8 INTERPRETER: Yes.

9 Q. So it would be possible for someone to see your name on
10 the website, and then, find your address?

11 INTERPRETER: If someone needs that.

12 Q. Now, as vice pastor to the church, do you have authority
13 over the youth?

14 INTERPRETER: Well, it's not, like, authority. We try to
15 be, like, a father figure, you know, in a sense. So
16 sometimes -- you know, sometimes they invite us to the youth
17 meetings, and we talk with them. We communicate with them
18 and discuss things with them.

19 Q. Is there a dedicated youth pastor at the church?

20 INTERPRETER: A specific one, no. It's actually in the
21 works, at this point.

22 Q. Okay. Okay. So this incident that happened with
23 , first, is it possible that his name may be

25 INTERPRETER: It's possible. I just know his first name

1 is Ivan. And that's what it's referred to in the letter. It
2 does not say . It just says

3 Q. Now, was this incident widely discussed among the youth,
4 that he had been hit in the head?

5 INTERPRETER: It was discussed. After that incident, we
6 discussed with the youth that, probably, two to three people
7 is not enough; that they should have larger groups when they
8 go out, so they would feel safer.

9 Q. But was this widely discussed among the Slavic community?

10 INTERPRETER: It was known to everyone.

11 Q. It was known to everyone. So most of the Slavic churches
12 in this area knew about this incident?

13 INTERPRETER: They did know about it.

14 Q. And, so, did you advise the youth as to being in bigger
15 groups during this time?

16 INTERPRETER: Yes.

17 Q. Okay. Okay.

18 Let me ask you something, too, before. Do you know
19 (phonetic)?

20 INTERPRETER: ?

21 Q. .

22 INTERPRETER: In Spokane?

23 Q. No?

24 INTERPRETER: No. It's not familiar to me.

25 Q. Do you know a (phonetic)?

1 INTERPRETER: Personally, I do not know him.

2 Q. Okay. All right. Now, from which country did you
3 emigrate?

4 INTERPRETER: Ukraine.

5 Q. Were you a Pentecostal in Ukraine?

6 INTERPRETER: No. Baptist church.

7 Q. And was your church a registered church?

8 INTERPRETER: We organized a new church, and it was in
9 the process -- and I think, at this time, they decided not to
10 register.

11 Q. Did you ever suffer any persecution in Ukraine for being
12 Baptist?

13 INTERPRETER: Yes. When I was in school, I was called
14 out and was shamed in front of everyone, and, like, in the
15 middle of a class, I would get called into the
16 vice-principal's office, and he would spend time with me,
17 talking to me like I am a criminal.

18 Q. Uh-huh. And do you know; is -- was the Pentecostal
19 church treated similarly in Ukraine?

20 MR. DIXSON: Object to the form of the question.

21 Q. (BY MR. PIDGEON) Do you know; was the Pentecostal church
22 in Ukraine also subjected to similar prosecution?

23 MR. DIXSON: Same objection.

24 INTERPRETER: It's on the same level. There was no
25 difference.

1 MR. PIDGEON: Let me rephrase the question to try to
2 answer the objection.

3 Q. (BY MR. PIDGEON) Were members of the Pentecostal Union
4 also called out and shamed because of their religious
5 affiliation in the Ukraine?

6 INTERPRETER: Yes.

7 MR. DIXSON: My objection is to the relevance of the line
8 of questioning. Not to the particular form of that question.

9 MR. PIDGEON: All right. It does go -- just to make a
10 statement to its relevancy, it does go to the question of why
11 the police were called or weren't called.

12 Q. (BY MR. PIDGEON) Do you know, also, in the history of
13 the Ukraine, were there incidents that you know of, where
14 members of either the Baptist Union or the Pentecostal Union
15 were incarcerated or killed because of their religious
16 affiliation?

17 INTERPRETER: It happened. My grandma's brother, he was
18 taken and never came back. My father's generation, many of
19 them were in prison. My parents were called to school and
20 were told not to take us to church with them. And teachers
21 would show up at the church services and would check upon us
22 if we were in church or not.

23 Q. Now, was this election concerning R-71, was that the
24 first time you voted in America?

25 INTERPRETER: Yes. It was the first time.

1 Q. And was this the first time you participated in the
2 political process in America?

3 INTERPRETER: First time.

4 Q. Do you intend to participate in the political process
5 again in the America?

6 A. I don't know.

7 Q. If you could do R-71 again, would you do it again?

8 INTERPRETER: I would.

9 Q. Okay.

10 INTERPRETER: I wanted for Biblical marriage to stay
11 together.

12 Q. Let me ask you this, too. Did you meet with me and
13 yesterday?

14 INTERPRETER: Yes.

15 Q. And did I give you an idea of what would happen at this
16 deposition?

17 INTERPRETER: Yes. Roughly, yes.

18 Q. And I explained to you that you couldn't bring other
19 church members into the deposition?

20 INTERPRETER: Yes, you did.

21 Q. And I also explained to you that you wouldn't be arrested
22 during this deposition? And I did explain to you that you
23 would not be arrested as a result of this deposition?

24 INTERPRETER: Yes.

25 Q. Now, do you know if you have been identified on any

1 blogs, or anywhere else on the website, as a significant
2 party associated with R-71?

3 INTERPRETER: Really, I don't know. I don't know how it
4 would actually occur. You know, really, it's a question in
5 my mind, why my name popped up.

6 Q. Okay. I want to go back to these stickers on the car.
7 Now, where were your cars parked?

8 INTERPRETER: Right in front of the house.

9 Q. Okay. Is that where you traditionally park?

10 INTERPRETER: Yes.

11 Q. Okay. And do your neighbors ever occasionally park in
12 those places?

13 INTERPRETER: Practically, no. They have their own
14 places.

15 Q. Okay. And do you think this occurred around August
16 of 2010?

17 INTERPRETER: Yes.

18 Q. Do you know whether or not it was after you were named as
19 a witness in this case?

20 INTERPRETER: Well, I don't even know exactly when I was
21 named as a witness.

22 Q. Uh-huh.

23 INTERPRETER: I found out about that on September 16th,
24 when I got a call from Jessica.

25 Q. So you never had -- there was never another incident that

1 occurred at your house?

2 INTERPRETER: No. Nothing was broken, or anything like
3 that.

4 Q. Okay. But this did occur after the election in 2009?

5 INTERPRETER: Well, yes. After that. Prior to that, you
6 know, I had no issues. I mean, I can't say 100 percent, for
7 sure, that it's connected to this, but --

8 Q. Okay. Now, you received a phone call from Jessica on
9 September 16th. Did you receive a phone call from Jessica
10 Hamilton on September 16th?

11 INTERPRETER: Yes. But I wasn't the actual person
12 talking to her. I was not home at that time. My son talked
13 to her. He called me afterwards and told me that some woman
14 called, saying that I am going to be a witness. Something to
15 that effect.

16 Q. And did she speak to you about a subpoena, or any of
17 these things?

18 INTERPRETER: It was a short conversation. He did not
19 talk to her for long, and I don't believe there was actual
20 discussion that there will be a subpoena coming.

21 Q. Okay.

22 MR. PIDGEON: I don't have anything further.

23 MR. DIXSON: Just a couple follow-ups.

24 EXAMINATION

25 BY MR. DIXSON:

1 Q. Were you aware of the incident at the time
2 it happened, or when you read letter a couple of
3 days ago?

4 INTERPRETER: I found out right after it happened. The
5 youth talked about it. But the letter I saw, personally,
6 yesterday.

7 Q. Okay. Have you had an opportunity, outside of
8 Referendum 71, to call law enforcement in the United States?

9 INTERPRETER: No.

10 Q. And do you have any reason to believe, if you did call
11 the police, that they would not respond to your request?

12 INTERPRETER: In my experience, when I lived in Ukraine,
13 and neighbors stopped by, and she asked me to call the police
14 because someone was trying to kill her, and I dialed the
15 number, and they told us, we will come tomorrow.

16 Q. Okay.

17 INTERPRETER: So, that was the situation. So I am not
18 saying, you know, the police would act here as the same way,
19 but where I was raised and I grew up, that's the experience I
20 had. So we didn't call, usually.

21 Q. And in the United States, do you have any reason to
22 believe the police would act here, as they did in the
23 Ukraine?

24 INTERPRETER: No. I have no reasons. I did not have
25 need, you know, or issues to call the police about. Maybe in

1 the future, if I have the need.

2 MR. DIXSON: That's all I have.

3 INTERPRETER: As far as I know, here, police arrive very
4 soon right after you call.

5 MR. DIXSON: Anne?

6 MS. EGELER: Just a few follow-ups.

7 EXAMINATION

8 BY MS. EGELER:

9 Q. So, is it your belief that the police here in the United
10 States are honest and helpful?

11 INTERPRETER: Yes.

12 Q. And I am wondering; can you tell me all of the Slavic
13 churches in the Spokane area?

14 INTERPRETER: No. I couldn't do that. I don't know
15 their addresses. I visit a few churches. I know where they
16 are located, but as far has the address goes, no.

17 Q. Do you know the names of all of the Slavic churches in
18 the Spokane area?

19 INTERPRETER: No.

20 Q. Do you know the names of all of the Slavic pastors in the
21 Spokane area?

22 INTERPRETER: No. I don't know that.

23 Q. So, is it fair to say that you don't know what they are
24 talking about in all of the Slavic churches in the Spokane
25 area?

1 MR. PIDGEON: Objection, as to form.

2 INTERPRETER: Each church is individual. And what is
3 discussed in each church is none of my business. It's that
4 church issue.

5 Q. (BY MS. EGELER) Earlier, you testified that all of the
6 Slavic churches in the area were discussing and were aware of
7 the incident with -- excuse me -- with .
8 How did you know that they were all talking about the
9 incident with ? Did you go and ask people in
10 those churches?

11 INTERPRETER: What do you mean, specifically?

12 Q. Are you guessing that there was discussion in other
13 churches, or do you actually know whether there was
14 discussion about the incident with ?

15 INTERPRETER: I don't know about the other churches. I
16 know it was discussed in our church, and I believe it was
17 discussed in other churches.

18 Q. So, what makes you believe? Do you know that it was
19 discussed in other churches, or are you guessing that it was
20 discussed in other churches?

21 MR. PIDGEON: Objection, as to form.

22 INTERPRETER: Can you repeat the question? I lost it for
23 a second.

24 Q. (BY MS. EGELER) Are you guessing that it was discussed
25 in other churches?

1 INTERPRETER: Well, I don't know if it was, like,
2 formally discussed at the high level, or something like that,
3 but I am sure the information was shared.

4 Q. How are you sure?

5 INTERPRETER: Well, because, especially youth in Spokane
6 from different churches, they communicate with each other.
7 They go to each other churches. They exchange texts, and,
8 you know, they stay in touch. So, that's how would I know.

9 Q. So you think that youth might have discussed it, but you,
10 yourself, did not discuss it with anyone from another Slavic
11 church?

12 INTERPRETER: There was no meetings, say, at the pastors'
13 level, between churches, to discuss that. That's right.

14 Q. Did you discuss the incident with anyone, at any level,
15 from another Slavic church?

16 INTERPRETER: What do you mean, at any level?

17 Q. I mean, not just discussion between pastors, but did you
18 have a discussion with any member of another Slavic church
19 who told you that their church was discussing the incident
20 with ?

21 INTERPRETER: I couldn't say that I talked to him, in
22 particular.

23 Q. And did any youth in your church tell you that they had
24 spoken to anyone at another church about the incident with
25 ?

1 INTERPRETER: No. There was no such conversation where I
2 would ask someone if they have talked to someone about it.

3 MS. EGELER: Okay. I have no further questions.

4 MR. PIDGEON: Just a little follow-up.

EXAMINATION

6 BY MR. PIDGEON:

7 Q. I need to use a word that is probably not going to
8 translate well. The Slavic community in Spokane is a
9 homogeneous community?

10 INTERPRETER: Yes. There is communication going on.
11 Sometimes we have youth gatherings from different churche
12 We have, you know, single gathering. At times, we have,
13 like, a choir visiting our church, from a different church
14 So we have those interactions.

15 Q. Do you also have pastor gatherings where the pastors come
16 together to meet?

17 INTERPRETER: Sometimes that happens, too.

18 Q. And do the youth ever share missions or camps or Bible
19 schools or any of that?

20 INTERPRETER: Yes. The summertime, we have camps for
21 youth, for younger youth, and any youth from other churches
22 join.

23 Q. So, would it be common, if a significant event happened
24 in one of the churches, that the reputation of that event
25 would go throughout the Slavic community?

1 MR. DIXSON: I object to the form of the question.

2 INTERPRETER: Yeah. That could happen. You know,
3 something of that level, sure.

4 Q. (BY MR. PIDGEON) For instance, if there was a fire in
5 one of the churches.

6 INTERPRETER: Of course.

7 Q. That would be known throughout the Slavic community?

8 INTERPRETER: Yes.

9 Q. When you talk speak about the Slavic community, you are
10 speaking about the Slavic community of believers, correct?

11 INTERPRETER: Yes.

12 Q. So you are not speaking about members of the Slavic
13 community who may be non-believers?

14 INTERPRETER: And also, to help explain, some of them are
15 non-believers, but they still come to church. To give an
16 example. Say there is a big family. You know, 10 different
17 families come to Spokane. Some will attend this church.
18 Some will attend the other church. But they still
19 communicate among each other.

20 Q. Now, the church that Pastor pastored, where you are a
21 vice pastor, are your services in the Russian language?

22 INTERPRETER: Yes.

23 Q. And to your knowledge, are most of the Slavic churches in
24 the community Russian speaking churches?

25 INTERPRETER: Yes. Mostly, yes.

1 Q. Are some English speaking churches?

2 INTERPRETER: Mostly, Russian speaking, but even we now
3 are introducing English, at some level. Sometimes in the
4 evening service, or during youth meetings, we do have
5 teachings in English.

6 Q. So, would you say that the Russian language is a
7 connector that connects this community?

8 INTERPRETER: Quite possibly.

9 Q. Okay. All right. Now, also, the youth in your community
10 are mostly bilingual; is that correct?

11 INTERPRETER: Yes.

12 Q. Uh-huh. And would you -- how would you characterize
13 their ability to text message and send e-mails and so on?

14 INTERPRETER: They do it constantly.

15 Q. Would you say that most of the youth have cell phones and
16 texting capability?

17 INTERPRETER: I would say that most of them do have that.

18 Q. Uh-huh. And, so, would you say that in your position as
19 a vice pastor, you would have knowledge about the general
20 news within the community?

21 INTERPRETER: What do you mean?

22 Q. For instance -- well, let's see. How can I ask this
23 question? The significant news that goes among the youth by
24 text messages and e-mails, would you expect that you would
25 know of this?

1 INTERPRETER: Yes. Well, say, for example, someone died.
2 You know, like, if someone died in a different church, we
3 would announce that in our church -- perhaps they have
4 relatives in our church -- so that they could attend the
5 funeral, too.

6 Q. And, so, was this event with of that kind of
7 importance?

8 INTERPRETER: We found out about it. We found out about
9 it right away. We talked about it. That's why we made
10 safety decisions for the groups to be bigger.

11 MR. PIDGEON: No further questions.

EXAMINATION

13 BY MR. DIXSON:

14 Q. And I don't want to open a new can of worms. Did you or
15 speak to your congregation, as a whole, about the
16 incident?

17 INTERPRETER: No. I would just like to point out, again,
18 that during regular services, we don't discuss any issues
19 like that. We just have a service.

20 MR. DIXSON: That's all for me.

21 Anne?

22 MS. EGELER: Nothing further.

23 MR. DIXSON: Do you want to explain to him about the
24 transcript and his options at this point?

25 MR. PIDGEON: Sure.

1 Once the transcript is completed, you can either waive
2 your signature without review, or he will provide you with a
3 copy that you can review. And in which case, you can go
4 through and see if what was interpreted was what you meant to
5 say. And then, so, if there are changes where you really see
6 something distinct, that's not what was being said, then you
7 can make the changes that you need to make, before you sign
8 it. But it is your election. It's one you are going to have
9 to make here this morning.

10 INTERPRETER: Well, if it contains what I responded to,
11 my correct responses, then I am ready to sign.

12 MR. PIDGEON: I think you should review it. That's my
13 opinion.

14 MR. DIXSON: There will be a transcript of this
15 deposition that's been recorded today. Would you like to
16 review that transcript, prior to signing it, or are you
17 comfortable with the transcript as it has been taken down by
18 our court reporter this morning?

19 INTERPRETER: No. I would like to review it, perhaps
20 with the interpreter, so that the interpreter could read it
21 to me and translate it to me.

22 MR. DIXSON: Okay. And you understand that the review
23 process is to correct any errors, if you said "yes" and meant
24 "no," but it is not a second run through the deposition?

25 INTERPRETER: Yes.

1 (Signature not waived.)

2 (Off the record at 11:14 a.m.)

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I have read the foregoing 60 pages of my testimony and I declare (or certify) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct, except for the corrections noted above.

Dated at _____, _____ this

_____ day of _____, 2010.

Redacted

1 STATE OF WASHINGTON

ss: Reporter's Certificate

2 COUNTY OF SPOKANE

3 I, Osmund D. Miller, a Certified Shorthand Reporter and
4 Notary Public in and for the State of Washington,

5 DO HEREBY CERTIFY:

6 That the foregoing is a true and correct transcription
7 of my shorthand notes as taken upon the deposition of

8 on the date and at the time and place as shown on
9 page one hereto,

10 That the witness was sworn upon his oath to tell the
11 truth, the whole truth and nothing but the truth, and did
12 thereafter make answers as appear herein,

13 That I am not related to any of the parties to this
14 litigation and have no interest in the outcome of said
15 litigation,

16 Witness my hand and seal this 28th day of October, 2010.

17

18

19 RPR, CCR No. 2280

20 OSMUND D. MILLER
21 Certified Shorthand Reporter and Notary
22 Public in and for the State of Washington,
23 residing in Spokane. My commission expires
24 on December 15, 2012.

25

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Exhibit One



**CASH RECEIPTS
MONETARY
CONTRIBUTIONS**

C3
(1/02)

THIS SPACE FOR OFFICE USE

100329360

10-14-2009

Candidate or Committee Name (Do not abbreviate. Use full name.)

Protect Marriage Washington

Mailing Address

PO Box 531

City

City	Zip + 4	Office Sought (candidates)	Election Date
Arlinton, WA	98223		2009

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received	Amount	Total
a. Anonymous
b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....
c. Loans, notes, security agreements. Attach Schedule L
d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation
Various e. Small contributions \$25.00 or less not itemized and number of persons giving ³⁵	(persons)	649.98
g. CONTRIBUTIONS OVER \$25.00		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
10/05/09	STEPHEN FUHRMAN 710 B HWY 395 NORTH KETTLE FALLS, WA 99141				100.00	100.00
		Occupation				
10/05/09	THERESA FUHRMAN 710 B HWY 395 NORTH KETTLE FALLS, WA 99141				100.00	100.00
		Occupation				
10/05/09	BRENDA GRASSEL PO BOX 141483 SPOKANE, WA 99214	Precision Cutting Spokane Valley, WA			125.00	125.00
		Occupation OWNERS				
10/05/09	CLINT GRASSEL PO BOX 141483 SPOKANE, WA 99214	Precision Cutting Spokane Valley, WA			125.00	125.00
		Occupation OWNER				
10/05/09	DAVID MILLER PO BOX 9292 SPOKANE, WA 99209				50.00	50.00
		Occupation				
	<input checked="" type="checkbox"/> Check here if additional pages are attached	Sub-total			1,149.98	
		Amount from attached pages			7,706.00	
3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.					8,855.98	*See reverse for details.

***See reverse
for details.**

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT
Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

8,855.98

4. Date of Deposit

10/09/09

Treasurer's Daytime Telephone No.:

I certify that this report is true and complete to the best of my knowledge.

Treasurer's Signature

Date

10-14-2009

EXHIBIT #1
WITNES
OSMUND D. MILLER
STOREY & MILLER

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 2

Candidate or Committee Name (Do not abbreviate. Use full name.) Protect Marriage Washington		Deposit Date 10/09/09
--	--	--------------------------

2. CONTRIBUTIONS OVER \$25.00		Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
10/05/09	SYLVIA MILLER PO BOX 9292 SPOKANE, WA 99209	Occupation			50.00	50.00
10/05/09	CYNTHIA ZAPOTOCKY PO BOX 8672 SPOKANE, WA 99203	Occupation HOUSEWIFE			500.00	1,500.00
10/05/09	MARBLE COMMUNITY FELLOWSHIP 3383 State Highway 25 Northport, WA 99157	Occupation			500.00	500.00
10/05/09	SHARON HUNTER 602 Kirkland Ave Kirkland, WA 98033	Occupation RETIRED			200.00	300.00
10/05/09	SHARON HUNTER 602 Kirkland Ave Kirkland, WA 98033	Occupation RETIRED			100.00	300.00
10/05/09	SARAH RTGBY 10301 45TH AVE NE SEATTLE, WA 98125	Occupation UNEMPLOYED			500.00	500.00
10/05/09	MYRTLE PARKER 2082 HERITAGE WAY ADDY, WA 99101	Occupation RETIRED			100.00	200.00
10/05/09	JACKIE PARKER 2082 HERITAGE WAY ADDY, WA 99101	Occupation RETIRED			100.00	200.00
10/05/09	KAREN KOY 205 EAST WISER LK RD LYNDEN, WA 98264	Self-Employed Lynden, WA Occupation BOOKKEEPER			50.00	200.00
10/05/09	MICHAEL WITMER P.O. BOX 3063 WENATCHEE, WA 98807	Occupation			75.00	75.00
10/05/09	SAMUEL THORNTON 1767 ROAD F.5 NE MOSES LAKE, WA 98837	Occupation RETIRED			50.00	150.00

Page Total 2,225.00

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 3

Candidate or Committee Name (Do not abbreviate. Use full name.)
Protect Marriage Washington

Deposit Date
10/09/09

2. CONTRIBUTIONS OVER \$25.00		Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
10/05/09	LORNE BLACKMAN 4176 STATELINE ROAD WALLA WALLA, WA 99362	Self-Employed Walia Walla, WA Occupation NURSERYMAN			250.00	250.00
10/05/09	LAURA BELVIN 30143 - 12TH AVE SW FEDERAL WAY, WA 98023	Self-Employed Federal Way, WA Occupation ENGINEER			200.00	249.50
10/05/09	ARLEIGH KERR 30026 FIRST PLACE SOUTH FEDERAL WAY, WA 98003	Boeing Seattle, WA Occupation COMPUTER PROGRAMMING			250.00	250.00
10/05/09	LYNDA KRESTINSKI 1560 SW CAMANO DR CAMANO ISLAND, WA 98282				50.00	75.00
10/05/09	VICKI PEEBLES 625 GOLF COURSE PLACE CHELAN, WA 98816	Culinary Apple Chelan, WA Occupation CLERK			100.00	221.00
10/06/09	STEVEN HARDEBECK 27403 SE 306TH ST BLACK DIAMOND, WA 98010				100.00	100.00
10/06/09	GRIGORIY GURMEZA 1520 99TH ST. S. TACOMA, WA 98444				50.00	50.00
10/06/09	SERGEY GURMEZA 1520 99TH ST. S. TACOMA, WA 98444				100.00	100.00
10/06/09	CASSIE NICHOLS 5970 WOODARD AVE. FREELAND, WA 98249				50.00	75.00
10/06/09	DENNIS MCKAY 22509 72ND PLACE W EDMONDS, WA 98026				50.00	100.00
10/06/09	ALEKSANDR NAUMCHIK 8103 72ND PL NE MARYSVILLE, WA 98270				100.00	100.00

Page Total 1,300.00

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 4

Candidate or Committee Name (Do not abbreviate. Use full name.)				Deposit Date					
Protect Marriage Washington				10/09/09					
2. CONTRIBUTIONS OVER \$25.00				Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
10/06/09	ROLF AMUNDSON 28911 81H AVE S FEDERAL WAY, WA 98003				Occupation RETIRED			100.00	300.00
10/06/09	MARY SORENSEN 12128 N. DIVISION ST. PMB 171 SPOKANE, WA 99218	Horizon Credit Union Spokane, WA			Occupation ADMINISTRATOR			250.00	300.00
10/08/09	RICHARD LONG 6905 172ND ST. NE ARLINGTON, WA 98223				Occupation			100.00	100.00
10/08/09	REBECCA OCONNOR 4010 TACOMA AVE S TACOMA, WA 98418				Occupation HOMEMAKER			375.00	375.00
10/08/09	KARIN SEWELL 7709 97TH AVE SW LAKEWOOD, WA 98498				Occupation			70.00	70.00
10/08/09	STEVEN THOMAS 19322 141 AVE SE RENTON, WA 98058	Dept of Army Fort Lewis, WA			Occupation COMPUTER SECURITY			101.00	101.00
10/08/09	MIKE CARROLL 7595 CABRINI DRIVE SE PORT ORCHARD, WA 98367				Occupation RETIRED			100.00	125.00
10/09/09	CHERYL ANDERSON PO BOX 7125 KENT, WA 98042	Monavie S. Jordan, UT			Occupation CONSULTANT			500.00	500.00
10/09/09	SANDY WIXSON 3332 EDMONDS AVE NE RENTON, WA 98056				Occupation			100.00	100.00
10/09/09	NATALYA BORUSHKO 3516 NE 10NE ST CAMSAS, WA 98607	Hudson Group Portland, WA			Occupation SUPERVISOR			200.00	200.00
10/09/09	HANS BUTSCHUN 110 MICHIGAN HILL RD CENTRALIA, WA 98531				Occupation RETIRED			100.00	250.00

Page Total 1,996.00

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 5

Candidate or Committee Name (Do not abbreviate. Use full name.) Protect Marriage Washington		Deposit Date 10/09/09
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2. CONTRIBUTIONS OVER \$25.00		Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total
10/09/09	SUZANNE BUTSCHUN 110 MICHIGAN HILL RD CENTRALIA, WA 98531	Farmers Centralia, WA Occupation SELF-EMPLOYED			100.00	250.00
10/09/09	MARSHALL ROBERTS 1924 MAIDEN LANE WENATCHEE, WA 98801				50.00	50.00
10/09/09	JOYCE ROBERTS 1924 MAIDEN LANE WENATCHEE, WA 98801				50.00	50.00
10/09/09	TAI OH 13304 2ND PLACE SE BURLEN, WA 98146				70.00	235.00
10/09/09	RAYMOND BRENSIKE 14117 SE 177TH ST #H204 RENTON, WA 98058				50.00	50.00
10/09/09	JACK RICHARDSON 11723 194TH AVE NE REDMOND, WA 98053				40.00	211.00
10/09/09	ASHLEY PERRY 9730 YELM HIGHWAY OLYMPIA, WA 98513				25.00	163.00
10/09/09	VIVIAN ROBINSON 10809 176TH CIR NE REDMOND, WA 98052				25.00	96.00
10/09/09	WILLIAM BACKLUND 23736 NE 116th Place Redmond, WA 98053				12.50	37.50
10/09/09	PATRICIA BACKLUND 23736 NE 116th Place Redmond, WA 98053				12.50	37.50
		Occupation			1,000.00	1,000.00

Page Total 1,435.00

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 6

Candidate or Committee Name (Do not abbreviate. Use full name.)
Protect Marriage Washington

Deposit Date

2. CONTRIBUTIONS OVER \$25.00

Page Total 750.00